UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHRISTOPHER WILTON OVERALL,	
Plaintiff,) Case No. 1:17-cv-00510
,	Judge: Joan B. Gottschall
V.) Magistrate Judge: Jeffrey T. Gilbert
VERDE ENERGY USA, INC.,)
Defendant.)

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant, Verde Energy USA, Inc., by and through its attorney David M. Schultz, moves pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for a 21-day enlargement of time from the original deadline, up to and including March 21, 2017, to file a responsive pleading to Plaintiff's Complaint. In support thereof, Defendant states as follows:

- This case involves alleged violations of the Fair Debt Collection Practices Act, 15
 U.S.C. §1692, et seq ("FDCPA").
 - 2. Verde Energy USA, Inc., was served on February 7, 2017.
- 3. Defense discussed this motion with Plaintiff's counsel. Plaintiff's counsel agreed to the enlargement of time requested herein.
- 4. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to pursue resolution of this matter, analyze the pleading, and prepare the appropriate response to the Complaint.

WHEREFORE, Defendant, Verde Energy USA, Inc., respectfully requests that this Court grant a 21-day enlargement of time from the original deadline, up to and including March 21, 2017, to file a responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

/s/ David M. Schultz

David M. Schultz

David M. Schultz Hinshaw & Culbertson LLP 222 North LaSalle Street Suite 300 Chicago, IL 60601-1081

Telephone: 312-704-3000 Facsimile: 312-704-3001 dschultz@hinshawlaw.com